



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

June 25, 2012

Mr. Brian Smart
Transportation Planner
Federal Transit Administration, Region IV
230 Peachtree Street NW, Suite 800
Atlanta, Georgia 30303

SUBJ: EPA Comments on the Atlanta Beltline Corridor Environmental Study
Tier 1 Final Environmental Impact Statement (FEIS)
City of Atlanta, Fulton County, Georgia
CEQ #:20120157; ERP #: FTA-E40839-GA

Dear Mr. Smart:

Pursuant to Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA), Region 4 has reviewed the subject document. EPA agreed to act as a cooperating agency for the Atlanta Beltline Project on August 19, 2008, we participated in interagency scoping and Atlanta Beltline technical advisory committee (TAC) meetings, the Beltline Sustainability Task Force and submitted Draft EIS Comments on the project. The Tier 1 FEIS evaluates the Federal Transit Administration (FTA) and the Metropolitan Atlanta Rapid Transit Authority (MARTA) proposal to develop a proposed fixed guideway transit and multi-use trails system within a continuous 22-mile corridor around the Midtown and Downtown Atlanta central business districts.

The proposed transit and trail elements of the Atlanta Beltline is intended to be part of a comprehensive development strategy that connects greenspace, trails, transit and new development along historic railroad corridor segments. The Atlanta Beltline combines transportation, affordable housing, brownfield redevelopment, historic preservation, parks and recreation, land-use component within its corridor.

The Tier 1 FEIS for the Beltline focuses on three key decisions: the selection of a preferred transit mode technology, the general alignment of transit and trails, and the necessary right-of-way (ROW). As a result of our review, EPA offers the following comments:

Two types of transit technologies were evaluated in the Tier 1 EIS - the modern street car (SC) and light rail transit (LTR). The Tier 1 FEIS identifies the SC as the preferred mode technology for the Atlanta Beltline. EPA continues to support the use of either technology for this project.

The Tier 1 EIS examined five transit alternative alignments (A, B, C, D, and F) and three trail alignments (Howell Junction Trail, Marietta Blvd Trail and On-Street Trail) in the northwest portion of the study area. Two transit alternative alignments (A and C) use portions of the existing CSX freight rail right-of-way (ROW), two transit alternative alignments are adjacent to but outside of the existing CSX ROW (B and D) and one transit alternative is adjacent to but outside the existing Norfolk Southern freight rail corridor. The rest of the Atlanta Beltline (northeast, southeast, southwest) follows the same transit and trail alignment.

EPA notes that alignment D was selected as the preferred transit alternative in the Tier 1 FEIS. This alignment includes the Marietta Boulevard Street Car. EPA typically promotes the selection of alternatives that utilize existing transportation ROWs because this would minimize the need for additional ROW and reduce the number of impacted parcels. ROW will be required to build the transit and rail network which can expose neighboring populations to moderate levels of noise.

The development of additional mass transit options for the populations within the City of Atlanta is a desirable goal. EPA supports this type of project in urban areas because it provides an alternative to the sole reliance on automobiles for transportation demand, and with proper mitigation should result in fewer adverse impacts. From an air quality perspective, mass transit options generally reduce the amount of additional greenhouse gas emissions in the transportation corridor. However, they are not without impacts. The Tier 2 FEIS should address specific parcel related impacts, noise, air quality, and water resource impacts associated with the selected corridor alignments. Attached are some specific air quality comments that should be addressed prior to the signing of the record of decision for the EIS.

Thank you for the opportunity to comment on this proposed action. If we can be of further assistance, please feel free to contact Ntale Kajumba at (404) 562-9620 or kajumba.ntale@epa.gov.

Sincerely,

Ntale Kajumba

for Heinz J. Mueller, Chief
NEPA Program Office
Office of Policy and Management

EPA Tier 1 FEIS Comments on the Atlanta Beltline Corridor

Air Quality - Section 3.12.1.2 "Pollutants of Concern"- The Tier 2 EIS should include more discussion on Atlanta's non-attainment status for the 1997 and 2008 8-hour ozone NAAQS and the 1997 PM_{2.5} annual NAAQS (Pg.3-106).

"Transportation Conformity Determination" - This project should have been carried forward into the Atlanta Regional Commission 2040 Long Range Transportation Plan (LRTP) updated last September. Before FTA signs the final environmental document or the record of decision, the selected alternative must be the same as it is in the LRTP. This project must also be reflected in the Transportation Improvement Program (i.e., Fiscal Year 2012-2018) if right-of-way is purchased and construction is planned in the near future (1 to 4 years). In addition, a PM_{2.5} hotspot analysis will have to be conducted to determine whether this project is a "project of air quality concern (Pg.3-109 Section 3.12.3)."